

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

Civil Action No. 04-10353 PBS

**SCANSOFT, INC.'S ASSENTED-TO MOTION TO FILE MEMORANDUM AND
ACCOMPANYING EXHIBITS 1-4, 6-13 UNDER SEAL**

Pursuant to Local Rule 7.2 and paragraph 14 of the parties' Protective Order, ScanSoft, Inc. moves for an order granting leave to file under seal ScanSoft's Memorandum in Support of its Motion to Allow Inspection of All Computers and Computer Servers in the Possession, Custody, or Control of VST or the Individual Defendants and to Compel VST to Provide Information Necessary for the Neutral Expert Procedure and Exhibits 1-4, 6-13, filed concurrently by hand. ScanSoft's Motion, a redacted copy of the supporting Memorandum, and Exhibits 5 and 14 are being filed concurrently electronically.

As grounds for the motion, ScanSoft states that the Memorandum cites to documents produced by VST marked HIGHLY CONFIDENTIAL and attaches these documents as Exhibits 1-4, 6-13.

Thus, pursuant to the terms of the Protective Order, ScanSoft moves that the Memorandum and accompanying Exhibits 1-4, 6-13 be placed under seal in the envelope

provided and that impoundment continue pursuant to Rule 7.2 and the terms of the Protective Order.

CERTIFICATE PURSUANT TO CIVIL LOCAL RULE 7.1

I hereby certify that on May 2, 2006, counsel for the parties conferred and that counsel for VST consented to this motion.

Dated: May 2, 2006

SCANSOFT, INC.,
By its attorneys,

/s/ Courtney M. Quish
Lee Carl Bromberg, BBO # 058480
Erik Paul Belt, BBO # 558620
Lisa M. Fleming, BBO # 546148
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CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on May 2, 2006.

/s/ Courtney M. Quish
Courtney M. Quish

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